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September 22, 2005

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW – Lobby Level  
Washington, D.C. 20554

Re: **Subscriber Notification Report** -- E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

On behalf of SBC Communications Inc. (SBC), I am submitting the attached report regarding SBC's compliance with the Commission's 911 subscriber notification requirements for VoIP services. If you have any questions or need additional information, please do not hesitate to contact me.

Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/ *Jack Zinman*

Jack Zinman

Attachment

cc: Byron McCoy  
Kathy Berthot  
Janice Myles

SBC Communications, Inc.  
**Subscriber Notification Report – September 22, 2005**  
WC Docket No. 05-196

In response to the information requested in the Enforcement Bureau's *Second VoIP 911 Public Notice*,<sup>1</sup> SBC Communications, Inc (SBC) submits the following report detailing its compliance with the Commission's VoIP 911 subscriber notification requirements.

**1. A detailed explanation regarding current compliance with the notice and warning sticker requirements if the provider did not notify and issue warning stickers or labels to 100% of its subscribers by the July 29, 2005 deadline. Providers expected to update this information include those that were in the process of providing notice and/or stickers to their subscribers, but had not completed the process by July 29, 2005.**

SBC currently provides a VoIP service, known as PremierSERV Hosted IP Communications Service (HIPCS), to business customers.<sup>2</sup> As of September 22, 2005, SBC had provided a Notice of VoIP 911 limitations to each of its active HIPCS subscribers. SBC had also provided a supply of tent cards to each of its active HIPCS subscribers. The tent cards, which are designed to be placed next to each HIPCS station, reiterate the warnings in the Notice. In addition, SBC had sent an Acknowledgement Form to each of its active HIPCS subscribers, asking the subscriber to affirmatively acknowledge that it had received and understood the Notice, and to return the Acknowledgement Form to SBC.<sup>3</sup>

**2. A quantification of the percentage of the provider's subscribers that have submitted affirmative acknowledgements as of the date of the September 1 and September 22 reports, and an estimation of the percentage of subscribers from whom the provider does not expect to receive an acknowledgement by September 28, 2005.**

As of September 22, 2005, SBC had received affirmative acknowledgements from 100 percent of its active HIPCS subscribers. SBC estimates that zero percent of its active HIPCS subscribers will not provide an affirmative acknowledgement by September 28, 2005.

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<sup>1</sup> *Enforcement Bureau Provides Further Guidance to Interconnected Voice Over Internet Protocol Service Providers Concerning Enforcement of Subscriber Acknowledgement Requirement*, WC Docket No. 05-196, Public Notice, DA 05-2358 (released August 26, 2005) (*Second VoIP 911 Public Notice*).

<sup>2</sup> The entity actually providing HIPCS to subscribers is an SBC affiliate known as SBC Internet Services, Inc. For simplicity, however, we refer to HIPCS as being provided by SBC in this report.

<sup>3</sup> See SBC September 1, 2005 Subscriber Notification Report, WC Docket No. 05-196 (Sept. 1, 2005), for a full description of the Notice and tent cards.

**3. A detailed description of any and all actions the provider plans to take towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory.**

Not applicable. As discussed above in response to question 2, SBC has received affirmative acknowledgements from 100 percent of its active HICPS subscribers.

**4. A detailed description of any and all plans to use a “soft” or “warm” disconnect (or similar) procedure for subscribers that fail to provide an affirmative acknowledgement by September 28, 2005. The Bureau notes that in their August 10, 2005 reports some providers, such as Telephone, Inc. and Broadview Networks, Inc., state that they will use a “soft” disconnect procedure to disconnect those subscribers that ultimately do not acknowledge having received and understood the customer advisory. As the Bureau understands it, the soft disconnect procedure will either disallow all non-911 calls or intercept and send those calls to the provider’s customer service department. Under this “soft” disconnect procedure, however, calls to 911 will continue to go to the appropriate Public Safety Answering Point (PSAP). A provider’s September 1 and September 22 reports must include either a statement that the provider will use a “soft” or “warm” disconnect (or similar) solution as of September 28, 2005, or a detailed explanation of why it is not feasible for the provider to use a “soft” or “warm” disconnect solution, as described above.**

Not applicable. As discussed above in response to question 2, SBC has received affirmative acknowledgements from 100 percent of its active HICPS subscribers.